

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NOS. 2018-321-E & 2018-322-E

In Re:

Application of Duke Energy Carolinas,) LLC for Approval of Proposed Electric) Transportation Pilot and An) Accounting Order to Defer Capital and) Operating Expenses) <hr style="width: 100%;"/> Application of Duke Energy Progress,) LLC for Approval of Proposed Electric) Transportation Pilot and An) Accounting Order to Defer Capital and) Operating Expenses) <hr style="width: 100%;"/>	JOINT REPLY COMMENTS OF DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC
--	---

Pursuant to S.C. Code Ann. Regs. 103-830, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (together, the “Companies”) respectfully submit these Joint Reply Comments to the Public Service Commission of South Carolina (the “Commission”) in support of the Companies’ Amended Applications for approval of their respective electric transportation pilots (“ET Pilots”) filed in Docket Nos. 2018-321-E and 2018-322-E on April 1, 2019. Because all parties have had an ample opportunity to participate in these proceedings, and no valid objections have been raised, the Companies respectfully request that the Commission grant the relief requested in the Amended Applications.

BACKGROUND

On October 10, 2018, the Companies filed applications for Commission approval of their respective ET Pilots. For DEC, the proposed ET Pilot included a Residential Electric Vehicle Charging Utility Management Program (“Residential EV Program”), an Electric Vehicle School

Bus Program (“EV School Bus Program”), an Electric Vehicle Transit Bus Program (“EV Transit Bus Program”), and a Direct Current Fast Charging Program (“DC Fast Charging Program”). For DEP, the proposed ET Pilot included an EV School Bus Program, an EV Transit Bus Program, and a DC Fast Charging Program. The proposed ET Pilots have received nearly three dozen letters of support from members of the community and industry.

At the request of the South Carolina Office of Regulatory Staff (“ORS”), the Commission held the comment period and any further action in the proceedings in abeyance, and permitted ORS to facilitate a stakeholder process. Order No. 2018-832 (Dec. 19, 2018). Thereafter, ORS hosted a Stakeholder Working Group meeting on January 28, 2019, and a follow-up conference call on March 7, 2019. A wide array of industry and government organizations participated in the Stakeholder Working Group, including twenty-four parties in addition to the Companies. *See* ORS Report, Appendix A (filed Apr. 1, 2019). As explained in the ORS Report, “the interested parties in this Docket which participated in the stakeholder process supported Duke Energy’s efforts to establish ET Pilots.” ORS Report at 1 (filed Apr. 1, 2019).

The Companies filed Amended Applications on April 1, 2019 to reflect feedback and recommendations received during the stakeholder working group process. The Amended Applications reflected the following modifications from the Companies’ originally submitted applications: adjusting the EV School Bus Program such that the incentive is approximately doubled and the number of participants is halved; establishing a minimum EV school bus range of 100 miles; doubling the number of DC Fast Charging stations; proposing to evaluate load management methods under the ET Pilot, including time-of-use rates; and proposing to conduct an ongoing stakeholder engagement process.

The Environmental Defense Fund (“EDF”) filed comments on April 19, 2019; the South Carolina Coastal Conservation League and the Southern Alliance for Clean Energy (together, “SACE/CCL”) and ChargePoint, Inc. (“ChargePoint”) filed comments on April 23, 2019; Siemens and the Alliance for Transportation Electrification (“ATE”) filed comments on May 13, 2019; Greenlots filed comments on May 16, 2019; and ORS filed comments on May 20, 2019. Also, on May 20, 2019, the Companies filed a request that the Commission defer action on the ET Pilots until such time as the Companies had had an opportunity to respond to ORS’s comments. The Commission granted this request in Order No. 2019-371 issued on May 22, 2019.

REPLY COMMENTS

As noted above, and as explained in the ORS Report, the Companies’ ET Pilots enjoy broad support from parties participating in these proceedings. These Reply Comments are intended to address proposed adjustments suggested in stakeholder comments.

A. The Companies’ Requested Deferrals

In their respective Amended Applications, the Companies requested that the Commission authorize the Companies, pursuant to S.C. Code Ann. § 58-27-1540, to defer in a regulatory asset the related depreciation expense, property tax, and incremental operation and maintenance (“O&M”) expenses, as well as the carrying cost on the investment and on the deferred costs at its weighted average cost of capital, incurred in connection with the ET Pilots until the Companies’ next general rate case following deployment of the ET Pilots. The Amended Applications explained that the requested deferrals would allow the Company to bridge the timing gap until the Companies’ next rate cases while conducting pilots that will allow the Companies to better understand the impacts and benefits of accelerated deployment of EV technology while simultaneously advancing the adoption of EVs and the deployment of electric transportation

infrastructure for its customers and for the good of the State of South Carolina. In the Amended Applications, the Companies explained that, without the accounting treatment requested, the Companies will not be able to match the ET Pilot expenses with revenue to be collected in new Commission approved base rates, and that such a mismatch of expense to revenue would be a departure from the fundamental “matching principle” in financial accounting. Accordingly, absent the deferral, the Companies may not be able to make the investments until such time they can be recovered. Additionally, the Companies explained that they would need to reevaluate the offerings under the proposed ET Pilots should the Commission not approve the deferral request.

In its comments filed on May 20, 2019, ORS recommends that the Commission deny the Companies’ request for an accounting order and require the Companies to explain why cost recovery under a Commission-approved Distributed Energy Resource (“DER”) program is not sufficient for this initiative prior to making a determination in these Dockets. As characterized by ORS, “Act 236 does not prohibit the Companies from investing in distributed energy resources outside of a DER Program and seeking recovery of those costs under generally applicable ratemaking principles and procedures.” Indeed, the cited code section expressly reserves the right of utilities to seek recovery outside of the DER program, and stipulates that such a proposal shall not create a negative inference concerning recoverability:

An electrical utility may invest in distributed energy resources or programs outside of an approved distributed energy resource program under this chapter. The utility may seek recovery of the costs associated with such programs and resources under the ratemaking principles and procedures generally applicable to electrical utilities outside of this chapter. The fact that such resources are not part of an approved distributed energy resource program shall create no negative inference concerning their recoverability under other ratemaking provisions.

S.C. Code Ann. § 58-39-130(A)(5). There is nothing in this statute that requires the Companies to demonstrate or explain why cost recovery must be under a DER program. Likewise, nothing in

the statute requires the Companies to show why cost recovery under a DER program is not sufficient. Nevertheless, the Companies point out that (1) pursuant to S.C. Code Ann. Regs. 103-823, utilities have a prerogative to include in their applications whatever particular authorization or permission they seek, and a utility is not—unless otherwise limited by law, regulation, or Commission order—constrained to some other relief than that which it has proposed, so long as what it has proposed is reasonable; and, (2) because the Companies have not proposed cost recovery through their respective DER programs as part of their originally filed applications or Amended Applications, parties who may be affected by increased DER program costs as a result of the ET Pilots are not on notice and have not had an opportunity to participate in these proceedings. In light of these factors, the Companies decline to propose cost recovery for the ET Pilots as DER programs.

i. These ET Pilot Proceedings Have Already Been Unduly Prolonged.

These proceedings have already been unduly prolonged. The Companies filed the original ET Pilot applications eight months ago on October 10, 2018, and requested expedited approval of the Pilots at that time. On November 15, 2018, ORS filed a letter requesting that interested parties be permitted to file comments on or before December 10, 2018. The Commission granted this request. On December 10, 2018, ORS filed comments proposing a stakeholder process “to be facilitated by ORS on or before January 30, 2019.” In Order No. 2018-832, the Commission permitted ORS to facilitate a stakeholder process and indicated that ORS would file its report on the stakeholder process on or before March 1, 2019. On February 19, 2019, ORS filed a letter requesting that it file its final report by April 1, 2019. The Commission granted this request. On April 1, 2019, ORS filed a report acknowledging that “[s]takeholders requested a limited comment period after these filings and the group agreed on April 23, 2019 as the deadline for final comments

in this Docket.” ORS Report at 5. On May 20, 2019, two days before the Commission had scheduled action on the ET Pilots, ORS filed comments proposing, among other things, cost recovery through DER. This is the first time the Companies—and other parties—had been presented with the idea of cost recovery for the Pilots through DER. The Companies submit that the Commission’s consideration of the ET Pilots should not be further delayed by a proposal for cost recovery for which the S.C. Code expressly provides that there shall be no negative inference should a utility propose cost recovery “under other ratemaking provisions.” S.C. Code Ann. § 58-39-130(A)(5). Further, based on the fulsome stakeholder process conducted in these proceedings, and on the substantive comments filed by interested parties, the accounting order request articulated in the originally filed applications and in the Amended Applications is ripe for Commission action.

ii. Deferrals Are Essential to the Timely Implementation of Customer Benefit Programs.

ORS states in its comments that, should the accounting orders be approved by the Commission, ORS reserves its right to address the reasonableness of actual ET Pilot costs *including the carrying costs* in subsequent general rate cases or other proceedings. The Companies take this opportunity to restate that the authorization sought in the originally filed applications and in the Amended Applications was for the Companies “to defer in a regulatory asset the related depreciation expense, property tax, and incremental operation and maintenance (“O&M”) expenses, as well as the carrying cost on the investment and on the deferred costs at its weighted average cost of capital, incurred in connection with the ET Pilot until the Company’s next general rate case following deployment of the ET Pilot.” Should the Commission approve the ET Pilots, the Companies would begin to make expenditures to implement a set of programs that benefit customers, and, by doing so, would begin incurring carrying costs on those

expenditures for the time value of the money invested. Permitting the Companies to establish a deferral account now and later denying the Companies the opportunity to recover carrying costs would deny the Companies the opportunity to recover the costs – none of which are currently included in rates—to advance EV technology and customer options in South Carolina.

The Companies submit that now is the appropriate time for the Commission to determine whether it will permit the recovery of carrying costs on the costs incurred to implement the ET Pilot programs. Should the ET Pilots be approved, the Companies will begin incurring costs to implement the programs immediately. It would be unreasonable for the Companies to incur the associated costs without a decision from the Commission as to whether the Companies' prudently incurred costs to implement the ET Pilots—including the associated carrying costs—will be recoverable. Therefore, should the Commission approve the ET Pilots, the Companies seek an affirmative ruling from the Commission concluding that the Companies will be permitted to defer—at the weighted average cost of capital—all capital-related costs, including the capital-related O&M costs necessary to implement the ET Pilots.

In their Amended Applications, DEC's ET Pilot includes estimated costs of approximately \$9.8 million and DEP's ET Pilot includes estimated costs of approximately \$4.7 million. These amounts include approximately \$5.8 million and \$2.7 million in capital-related O&M for DEC and DEP, respectively. Such capital-related O&M will cover data networking costs, ongoing costs with fast charger operations, residential rebates, school and transit bus rebates, and other capital-related O&M costs. Although these costs are classified as O&M from an accounting perspective, practically, they are capital-related as they would not be incurred but for the associated capital costs. Further, the programs proposed under the ET Pilots simply could not be effective without the Companies incurring the associated capital-related O&M costs. A return on the deferred

recovery of costs incurred to finance a customer benefit program is appropriate for *all* costs incurred to implement the program, no matter whether the costs are incurred for capital or O&M. That some of the deferred costs may be for capital and some may be for related O&M has no bearing on either (1) the benefit that accrues to the customer or (2) the amount of costs, including carrying costs, borne by the utility to implement the associated program or to deploy and make useful the associated infrastructure.

As the Commission has previously found in the demand-side management and energy efficiency (“DSM/EE”) context, deferring the recovery of costs results in the incurrence of carrying costs by the utility. *See, e.g.*, Order No. 2009-373 at 24, Docket No. 2008-251-E (2009) (“Under PEC’s proposal, if the Company defers recovery of its DSM/EE costs, it will incur carrying costs.”). In that Order, the Commission found that, because the expense of the carrying costs associated with the utility’s deferred cost recovery was a “legitimate part” of its rate proposal, “the company must be allowed its recovery.” *Id.* The Commission further concluded that “the recovery of carrying costs is not an incentive, but merely a mechanism to provide for the recovery of costs associated with developing, implementing, and managing the DSM/EE programs.” *Id.* This is exactly the dynamic that exists in the instant proceedings. The Companies have proposed to defer the recovery of reasonable costs, the Company will incur carrying costs as a result of the deferral, and the later recovery of such carrying costs would not be an incentive but would rather be a mechanism to recover prudently incurred costs, which will be subject to audit and review prior to recovery.

A deferral such as the one requested by the Companies provides significant value to customers as they permit utilities to more quickly implement customer benefit programs that provide options and put downward pressure on rates, all while launching new technologies for a

smarter energy future. Rather than waiting until such a program can be timed for a rate case, and utilities can roll out programs—where appropriate—much earlier because the Commission’s approval of deferral accounting gives the utility assurance of later recovery, so long as the Commission later finds that the associated costs were prudently incurred. As explained in the recent DEP rate case order, customers benefit by receiving services that the utility pays for up-front and, “to the extent that a rate case would have increased rates, from lower rates over that period.” Order No. 2019-341 at 96, Docket No. 2018-318-E (May 21, 2019). Where such programs are in the customer interest, and in order to mitigate the regulatory lag associated with cost recovery, the Commission has approved the implementation of deferral accounting and in similar instances allowed a return on deferred amount during the deferral period.

Should the Commission decide that the benefits to ratepayers and to South Carolina as a whole are outweighed by costs associated with the ET Pilots, and therefore that such costs are not appropriately deferred and recoverable from ratepayers, the Companies would need to reevaluate their offerings, if any, under the proposed ET Pilots. The Company also notes its proposed programs have received overwhelming support from various customers and other parties, and no other participant in this proceeding has objected to the Companies’ deferral requests.

B. DC Fast Charging Programs

ChargePoint suggests that the Companies’ proposed expansion of the DC Fast Charging Programs in the Amended Applications could interfere with “market dynamics,” and that the expanded programs are beyond that which was originally proposed by the Companies. While it is true that the expanded programs are beyond that which was originally proposed, the expansion was a direct outcome of the stakeholder process in which ChargePoint participated. During that stakeholder process, many participants supported an expanded DC Fast Charging program, and

suggested that an increase in the deployed DC fast chargers would support the development of a market for charging services in South Carolina. In particular, the concern that the originally proposed DC Fast Charging Programs were too limited was raised by Greenlots, who supported an expansion of those programs. ABB, Inc., Sierra Club, NovaCharge, and ATE voiced support for the Companies' proposed expansion during stakeholder discussions, and Siemens, ATE, and Greenlots filed comments with the Commission supporting the Companies' proposed expansion. On this issue, ORS supports the DC Fast Charging Programs as originally proposed, and recommends a cost-benefit analysis before they are further expanded. The Companies would note that an independent, third-party consultant report was filed as Exhibit A to the Companies' Applications. That report evaluated the costs and benefits of the adoption of plug-in electric vehicles in South Carolina, finding that financial benefits "would accrue to all electric utility customers in South Carolina due to greater utilization of the electric grid during low load hours" M.J. Bradley & Associates, LLC, Electric Vehicle Cost-Benefit Analysis: Plug-in Electric Vehicle Cost-Benefit Analysis: South Carolina (June 2018).

Further, as previously explained, the Companies used the EVI-Pro Lite tool developed by the U.S. Department of Energy to determine the demand for DC fast chargers given current forecasts of EV market growth through 2025. The results showed a need of 1,000 DC fast chargers to support Year 2025 forecasts. There are currently, however, only 40 public, open-standard DC fast chargers in the state of South Carolina. Given the forecasted infrastructure need for 1,000 charging stations, the Companies' proposal of 60 stations is modest and reasonable. Further, the Companies believe that the argument that their DC Fast Charging programs will "chill investment" is without merit when the Companies' proposal is equal to only 6 percent of the anticipated need for charging stations. As explained in the Amended Application, expanding the DC Fast Charging

Programs will better facilitate cross-state EV travel, help ensure that customer-funded chargers remain well-maintained and useful for the long term, and improve the penetration of DC fast charging stations such that they are made available to all customers rather than only to those of demographics or locations that are early adopters of new technology.

C. EV School Bus Programs

ORS recommends that the Companies' investments under the EV School Bus Programs be limited to charging stations and make-ready infrastructure, and argues that the Companies should not provide rebates for EV school buses absent a clear policy directive from the Commission. In view of the limited offerings proposed by the Companies under the ET Pilots, the Companies submit that no overarching policy directive is necessary for approval of the proposed programs at this time. Nevertheless, the EV School Bus Programs as proposed by the Companies hold tremendous value and promise for the Companies' customers, and the Companies note that the Greenville County School District and Florence School District One filed letters supporting the EV School Bus Programs.

As explained in the Amended Applications, the EV School Bus Programs are designed to facilitate the replacement of older diesel school buses with modern, clean, zero-emission electric school buses. The State of South Carolina operates one of the oldest school bus fleets in the country, with over 500 buses model year 1988 or older. The age of these buses leads to high levels of annual NOx emissions, higher operating costs, and frequent safety issues. The Company believes there is potential for significant operational (fuel and maintenance) cost savings to operators of electric school buses, diesel emissions reductions benefits and electric system benefits from the adoption of electric school buses in South Carolina. As also explained in the Amended Applications, the EV School Bus Programs are intended to complement the S.C. Department of

Education's and S.C. Department of Insurance's commitment to funding the replacement of some of the diesel school buses in South Carolina with electric school buses from the VW Settlement Environmental Mitigation Trust, and approval of this component of the Companies' proposals is critical to establishing the Companies' proposed plan prior to the finalization of the State's Beneficiary Mitigation Plan under the settlement trust. Further, the program as proposed permit the Companies to better understand the grid impact and value that an electric bus battery can offer both during the useful life of a school bus and then afterward as a utility-owned asset. If value is found as a result of the pilot, all ratepayers will benefit from the positive grid impact and downward rate pressure due to expanded use of electric school buses.

D. Rate Design

EDF recommends that, prior to program commencement, the Companies should provide stakeholders with all of the types of load management methodologies and Vehicle-to-Grid capabilities that it intends to study, and give stakeholders an opportunity for comment. The Companies have provided complete transparency for the proposed ET Pilots and there has already been ample opportunity for all stakeholders to comment on program design. Further, per the Amended Applications, the Companies propose to conduct an ongoing stakeholder engagement process with interested parties in an effort to understand these parties' experience with the ET Pilots and to provide interim results from the programs. As part of this process, the Companies will host annual meetings to provide stakeholders with updates and give stakeholders the opportunity to ask questions and provide feedback. The Companies propose to document these stakeholder meetings and provide summaries to the Commission as part of their annual ET Pilot reports

EDF also recommends that the Companies include a plan to mitigate demand charges during the term of the ET Pilots, pointing to utilities operating in New York and California as examples of utilities who have mitigated demand charges during the early stages of EV adoption. The Companies believe that comparing the Companies' rates with utilities operating in New York and California is not an accurate or useful exercise. The Companies have extensively analyzed their commercial and industrial rates and found them to be well-suited for EV charging. The Companies' rates include demand charges of less than half the level used in the example provided in EDF's comments, so its example is of limited value in understanding the Companies' proposals. In fact, an analysis of estimated transit and school bus fueling costs was presented during the stakeholder process and is included in the final stakeholder report submitted by the ORS. That analysis demonstrates the significant cost savings possible from existing rate structures compared to diesel fueling costs. The Companies have agreed as part of the amended filing that they will take the data and conclusions from this pilot and review any opportunities for rate modification as part of their final report.

EDF also recommends that the Companies be required to convene a working group to study EV charging practices and the impact on demand charges, and to develop rate designs that balance all stakeholder interests. Per the Amended Applications filed by DEC and DEP, the Companies have already proposed to conduct an ongoing stakeholder engagement process with interested parties in an effort to understand parties' experience with the ET Pilots and the effectiveness of the Pilots' programs. Under this process, the Companies will host annual meetings to provide stakeholders with updates on the Pilots' programs, and permit stakeholders to ask questions and provide feedback. The Companies propose to document these stakeholder meetings and provide summaries to the Commission as part of the Companies' annual ET Pilots report.

SACE/CCL suggest that the Companies should begin analyzing potential rate designs, including time-of-use rates, earlier than the conclusion of the ET Pilots, because the Companies conducted previous ET pilots in 2011. While the pilots initiated in 2011 helped the Companies understand charging behavior and the impact it had on the grid at that time, since then, the market has rapidly evolved and is completely different. For example, in 2011, there were only two electric vehicle models available in the Carolinas. There are now forty-five. The typical driving range for an all-electric vehicle was 84 miles then when it now ranges from 200 to 300 miles per charge. In 2011, a typical charging experience was done at home, overnight, using AC power over 8 hours. Now, the market offers public charging during the day using DC fast charging at rates that can take 30 minutes or less. New technology encouraging different behavior is already having a different impact on the grid. For that reason, a successful pilot requires a new baseline. Also, the previous pilots were limited to electric vehicle charging behavior and its impact on the grid. The Pilots proposed in these proceedings will also be conducting load management events with its customers.

SACE/CCL also recommend that, given the potential for peak charging and demand charges typically included in commercial and industrial rates, the Companies should begin analyzing the potential rate designs for EV charging for commercial and industrial classes after they determine and understand the baseline charging patterns and behaviors. Commercial customers (including transit agencies and school districts) currently have access to existing time-of-use rates. As explained above, the Companies have extensively analyzed their commercial and industrial rates and have found them to be well-suited for electric vehicle charging. An analysis of rates nationally will find the Companies' rates to be highly competitive and provide significant savings to gasoline or diesel users without the need to create new rates. In fact, an analysis on

transit and school buses was presented during the stakeholder process and is included in the ORS Report. Also, as explained in the Amended Applications, the Companies are committed to evaluating the data and conclusions from these Pilots and reviewing any opportunities for rate improvements as part of its final report.

E. Other Comments

SACE/CCL recommend that DEP include a residential component as part of its ET Pilot. However, the Companies must consider the cost-effectiveness of the Pilots. In order to limit the overall cost of the Pilots, the programs included were limited to those which were determined to be the most essential to supporting EV adoption and providing cost savings and emissions reductions benefits to the greatest number of customers. The School Bus and Transit Bus programs are included in DEP's Pilot in order to provide proportionate cost savings and emissions reduction benefits to DEP public agencies as those provided to DEC. The DC Fast Charging program is included to install a foundational level of infrastructure to support long-distance travel. DEP's ET Pilot does not include a Residential EV Program in order to permit it to fund these other programs at suitable and appropriate levels.

SACE/CCL also suggest that the Companies include additional specific components of the ET Pilots for underserved and low-income communities, such as locating public chargers in low-income areas, encouraging chargers in multi-family dwellings, studying electric car-sharing and ride-sharing services, and increasing education and outreach to low-income populations. The primary goal of the proposed ET Pilots, however, is to lay a foundation for future higher growth of EV adoption, thereby efficiently increasing utilization of the electric system and putting downward pressure on rates over the long term. This potential future downward rate pressure benefits all customers whether they personally drive an EV or not. Another goal of the Companies

is to control the budget and scope of the Pilots to a reasonable cost. The Companies believe the Pilots, as proposed in the Amended Applications, accomplish this goal and benefit all customers. Although these suggested additions could be part of future programs proposed and offered by the Companies, given the limited scope of the Pilots, the Companies believe that it is not appropriate to include them at this time.

ChargePoint suggests that the Companies open up the EV Pilots to multiple EV charging network providers rather than choosing one network. The Companies, however, maintain that the use of a single network is necessary to the successful implementation of the ET Pilots. Incorporating multiple platforms for networking software, commissioning hardware, managing participation, analyzing data, communicating load curtailment events, processing event “opt-outs,” and managing rebate payments across various networks and tools would introduce excessive complexity and cost in the context of these limited Pilot programs.

CONCLUSION

As previously discussed, the proposed ET Pilots are designed to determine best practices for realizing the significant potential benefits of increased electric transportation adoption in South Carolina, including customer benefits from increasing electric system utilization and economic benefits from retaining fuel cost savings in the state, improving the state energy trade balance, and deploying cutting-edge vehicle technology. The Companies appreciate the participation of stakeholders in further refining the Companies’ applications, and the support of many parties interested in these pilots and respectfully request that the Commission grant the relief request in the Amended Applications.

{Signatures on next page}

**DUKE ENERGY PROGRESS, LLC
DUKE ENERGY CAROLINAS, LLC**

Heather Shirley Smith, Esquire
Deputy General Counsel
Duke Energy Progress, LLC
40 West Broad St., Suite 690
Greenville, South Carolina 29601
Telephone: (864) 370-5045
heather.smith@duke-energy.com

s/Samuel J. Wellborn

Samuel J. Wellborn (SC Bar No. 101979)
Frank R. Ellerbe, III (SC Bar No. 01866)
Robinson Gray Stepp & Laffitte, LLC
1310 Gadsden Street
Columbia, South Carolina 29201
Telephone: (803) 929-1400
swellborn@robinsongray.com
fellerbe@robinsongray.com

Attorneys for Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC

June 13, 2019